

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

SONYA LARSON,

Plaintiff

v.

DAWN DORLAND PERRY,
COHEN BUSINESS LAW GROUP, PC and
JEFFREY A. COHEN, ESQUIRE,

C.A. No. 1:19-cv-10203-IT

Defendants

DAWN DORLAND PERRY,

Plaintiff-in-Counterclaim

v.

SONYA LARSON,

Defendant-in-Counterclaim

AFFIDAVIT OF HANNAH Y. AMADEI

I, Hannah Y. Amadei, being of legal age and having been duly sworn, depose and say as follows:

1. I am an attorney with the law firm Partridge Snow & Hahn LLP located at 30 Federal Street, Boston, Massachusetts. My firm represents the Defendant/Plaintiff-in-Counterclaim Dawn Dorland Perry ("Ms. Dorland") in the above-captioned action.
2. I am admitted to practice in the Commonwealth of Massachusetts and before this Court.
3. The facts provided in this Affidavit are true and correct to the best of my knowledge and if called as a witness, I would and could testify to these facts.

4. Attached as **Exhibit A** is a true and correct copy of an email from Sonya Larson to authorcare@audible.com with the subject line “Adjusted Story?” dated May 4, 2016, and bearing Bates-label LARSON 74.

5. Attached as **Exhibit B** is a true and correct copy of an email from Sonya Larson to Yael Goldstein Love, with the subject line “A 3rd Audible Submission,” attaching a file with the file name “The Kindest, 11.30.15.docx” bearing Bates-label LARSONP3000203 – LARSONP3000221.

6. Attached as **Exhibit C** is a true and correct copy of an email dated December 28, 2015, from Sonya Larson to Jennifer 8. Lee and Yael Goldstein Love, with a subject line “Re: Audible,” attaching a file with the file name “The Kindest, 12.27.15.docx” bearing Bates-label LARSONP3001037 – LarsonP3001058.

7. Attached as **Exhibit D** is a true and correct copy of Plaintiff, Sonya Larson’s Objections and Responses to the First Request for the Production of Documents of Defendant, Dawn Dorland Perry.

8. Attached as **Exhibit E** is a true and correct copy of an email chain between Sonya Larson, Adeena Reitberger, and Rebecca Markovits regarding bearing the subject line “BASS” dated March 5, 2018, bearing Bates-label ASF0436 – ASF0452.

9. Attached as **Exhibit F** is a true and correct copy of an ASF email exchange between Ms. Markovits and Ms. Larson, sent on June 30, 2017, with the subject line “Galleys!” bearing Bates-label ASF0553 - ASF0561.

10. Attached as **Exhibit G** is a true and correct copy of a GrubWrites blog post titled “Update for the GrubStreet Community 10.29.21” with a last updated date of October 29, 2021.

11. Attached as **Exhibit H** is a true and correct copy of a letter from Paul S. Sennott, of Sennott Williams & Rogers, LLP to Jeffrey A. Cohen of Cohen Business Law Group, dated July 10, 2018, with the subject “Dawn Dorland Copyright Claim”.

12. Attached as **Exhibit I** is a true and correct copy of emails exchanged between Dawn Dorland and Eve Bridburg dated August 31, 2018 and August 30, 2018, with the subject

line “GrubStreet instructor & consultant resignation” bearing Bates-label DORLAND00329 – DORLAND00331.

13. Attached as **Exhibit J** is a true and correct copy of text messages exchanged between Sonya Larson and Sari Boren, dated June 16, 2017, bearing Bates-label LARSONP3000029.

14. Attached as **Exhibit K** is a true and correct copy of a letter sent by Michael S. Hanna of Cohen Business Law Group to James A. Gregorio, Esq., dated September 6, 2018 with the subject Dawn Dorland Final Settlement Demand and Reservation of Rights.

15. Attached as **Exhibit L** is a true and correct copy of an email from Sonya Larson to David Wallace dated August 12, 2016 bearing the subject “Fiction Submission from Sonya Larson.”

16. Attached as **Exhibit M** is a true and correct copy of *The Kindest*, with a file name “The Kindest for The New Yorker.pdf”.

SIGNED under the penalties of perjury this 23rd day of December, 2022.

/s/Hannah Y. Amadei
Hannah Y. Amadei (BBO #710509)

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of December, 2022, this document was filed and served through the ECF system and sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Hannah Y. Amadei
Hannah Y. Amadei (BBO #710509)